IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

-----X

A/S DAN-BUNKERING LTD.

Plaintiff,

v. : CIVIL ACTION NO. 4:15-cv-00396

M/V KACEY (IMO No. 9420277) :

her Engines, tackle,

appurtenances, etc., in rem,

Defendant.

· -------

CONSENT TO RELEASE OF THE VESSEL

ADMIRALTY

As the attorney-in-charge for the proponent of the seizure of the M.V. Kacey (IMO No. 9420277), I represent that:

- 1. My client consents to the release of the vessel;
- 2. Counsel representing all parties consent to the release; and
- 3. The Court has not entered an order that would prevent the release of the vessel.

Dated: February 13, 2015 A/S DAN-BUNKERING LTD.

Houston, TX

BY: BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, PC

BY: <u>/s/ Eddy De Los Santos</u>

Eddy De Los Santos Federal Bar No. 602417 Texas Bar No. 24040790

edelossantos@bakerdonelson.com

Katriel C. Statman
Federal Bar No.: 2513924
Texas Bar No. 24093197
kstatman@bakerdonelson.com
1301 McKinney Street, Suite 3700
Houston, Texas 77010

Telephone: 713-650-9700 Facsimile: 713-650-9701

OF COUNSEL:

CHRISTOPHER O. DAVIS (LBN 4722) DAWEI ZHANG (LBN 20037) 201 St. Charles Avenue, Suite 3600 New Orleans, Louisiana 70170 Telephone: (504) 566-5200

Telecopier: (504) 636-4000 codavis@bakerdonelson.com dzhang@bakerdonelson.com

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of February, 2015, a true and correct copy of the foregoing was served Defendant as indicated below and all counsel of record via electronic mail in accordance with the Federal Rules of Civil Procedure.

M/V Kacey (IMO No. 9420277 c/o Ivan M. Rodriguez, Esq. Chaffe McCall, L.L.P. 801 Travis Street, Suite 1910 Houston, TX 77002 713.343.2951 rodriguez@chaffe.com